

Mr. Richard L. Valent
Wyoming Public Service Commission
Supreme Court Building
Cheyenne, WY 82002

Dear Mr. Valent:

Thank you for your letter of December 6, 1974, asking several questions concerning the applicability of 49 CFR 192.457(b)(1) to two mechanically coupled, bare transmission lines constructed in the 1930's.

You ask whether installing anodes when leaks detected on the lines are repaired satisfies section 192.457(b)(1). This section requires that bare or ineffectively coated transmission lines installed before August 1, 1971, except for cast or ductile iron lines, be cathodically protected in accordance with Subpart I in areas in which active corrosion is found. In addition, section 192.457(b) requires the operator to determine areas of active corrosion by electrical survey, or if impractical, by studying corrosion or leak history records, by leak detection survey, or by other means. Thus, the method proposed for compliance with section 192.457(b)(1) would be satisfactory only where it is impractical to find areas of active corrosion by electrical survey and instead leak surveys are utilized, and the cathodic protection installed complies with Subpart I, specifically section 192.463.

Secondly, you ask if section 192.467(b)(1) is intended primarily for transmission lines traversing areas with heavy population. The requirements of section 192.457(b)(1) apply regardless of the population of the areas in which a transmission line is located.

Finally, you ask if the company involved may apply to this office for waiver of applicable requirements. Assuming the transmission lines to which you refer are under the jurisdiction of the Wyoming Public Service Commission, section 3(e) of the Natural Gas Pipeline Safety Act of 1968 provides that the Commission, as a certified State agency, may grant waivers from compliance with the Federal gas pipeline safety standards, subject to the approval of the Secretary of Transportation. Because of this unique Federal and State relationship, the Commission is the proper forum at which the company should present its request for waiver rather than this office.

We trust this adequately responds to your inquiry.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety

December 6, 1974

Mr. Joseph C. Caldwell, Director
Office of Pipeline Safety
TES-30
Department of Transportation
Washington, D.C. 20590

Re: Minimum Federal Safety Standards §192.457(b)(1).

Dear Mr. Caldwell:

Section 192.457(b)(1): Except for cast iron or ductile iron, each of the following buried or submerged pipelines installed before August 1, 1971, must, not later than August 1, 1976, be cathodically protected in accordance with this subpart in areas in which active corrosion is found:

- (1) Bare or ineffectively coated transmission lines.

This requirement for corrosion control will cause many problems for the operator of the following:

A company operates two transmission lines that traverse over one hundred miles in primarily class one location. The two lines are constructed of 10", 12" and 14" bare pipe, mechanically coupled, with sections of pipe laid in the 1930's. The two lines crossover between 10 and 15 times. The lines are located in many different types of soils, cross marshes, streams, rivers, etc.

The company has leak surveys, leak repairs, anode locations, pipe replacement records etc. for these lines.

If it is required that this company meet the requirements of Section 192.457(b)(1), this company will probably have to bond all of the mechanical coupling (occurring every 20 to 30 feet), cross bond all cross overs, install deep well anode beds, and install rectifiers.

The economics involved here look to be prohibitive. The company would be better off to construct a new larger line that would replace the existing two.

When this company finds a leak on either of these lines, digs it up, repairs the leak, installs anodes etc., does this meet the requirements of Section 192.457(b)(1)

"cathodically protect areas of active corrosion". This means that sections between mechanical coupling are essentially cathodically protected without monitoring.

During a two (2) day industrial seminar, I was told that §192.457(b)(1) was intended primarily for transmission lines traversing through areas with heavy population. If this is the case, this section should be further defined to clearly state which lines are required to be cathodically protected. (Based on class location etc.)

If the above is not correct, should the company apply to O.P.S. for a waiver of this requirement for this particular case?

I hope that this letter has given you an insight to this special problem and I hope that you can see the undue burden this section will impose on this company if they are required to protect these lines.

Any assistance you can give me will be appreciated. I intend to work closely with this operator in order to help him come into compliance before the 1976 deadline.

Best regards,

Richard L. Valent
Engineer